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October 15, 2002

Hon. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Ave., N.E., Suite 110
Washington, D.C. 20002

Re: Quarterly TTY E911 Report in CC Docket No. 94-102

Dear Ms. Dortch:

Attached please find an original and four copies of Cellular XL's most recent TTY E911 quarterly report. I have also filed the report via the FCC's Electronic Comment Filing System and e-mailed a copy to Mindy Littell at mlittell@fcc.gov.

Very truly yours,


Neil Fried
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: Barry J. Ohlson, Chief, Policy Division, Wireless Telecommunications Bureau
Pam Gregory, Director, Disabilities Rights Office, Consumer & Governmental
Affairs Bureau

TTY Status Report: Third Quarter 2002

Cellular XL Associates, L.P.

October 15, 2002

Network Infrastructure Software Development

Cellular XL Associates, L.P. (Cellular XL) operates a Nortel Wireless 100 (W-100) hybrid wireless and wire line switch in its network. Nortel Networks has no TTY solution for the W-100 switch. To meet TTY requirements, Cellular XL and Nortel Networks have undertaken a project to split the wireless and wire line functionality into two separate switches – a DMS 100 wire line switch and a DMS-MTX wireless switch. Both switches must be in place before the DMS-MTX can be upgraded to the Nortel MTX10 software load required for proper TTY functionality.

Due to the extensive nature of this upgrade, Nortel Networks has informed Cellular XL that it will be unable to complete the upgrade until 4th quarter 2002. Cellular XL anticipates completing the switch upgrade by November 16, 2002. Although the software is generally available, Nortel has been focusing its installation efforts on large, nationwide carriers. Nortel has stated it will not complete the extensive software upgrade for Cellular XL before the fourth quarter of 2002. Therefore, Cellular XL filed a one-year waiver with the FCC as it was unable to meet the compliance deadline of June 30, 2002.

Handset Development and Testing Plans

Cellular XL must rely on handset vendors to provide this solution. Cellular XL is gathering information from handset manufacturers and Nortel in its search for TTY-complaint handsets that Nortel deems compatible with its switch. Cellular XL has so far been unable to find such handsets, but is working with its vendors to acquire handsets as soon as possible.

Beta Testing and Lab Testing

Cellular XL is in contact with handset manufacturers and with Nortel Networks and will be gathering information on handsets Nortel deems compatible with its switch. Once Cellular XL has this information from Nortel, it will acquire handsets and test for compatibility and quality assurance in its own network.

Release and General Availability to Carriers of Network Infrastructure Software

Please see Nortel Networks' 2002 Second Quarter Status Report for release and general availability information.

Availability to Carriers of Full Acceptance Test Unit

Cellular XL expects commitments from Nortel Networks to test the performance of their software solution prior to implementation

Efforts Toward Achieving Digital Wireless Solution Compatibility with Enhanced TTY Devices

Cellular XL has been working with Nortel to achieve compliance with several regulatory obligations, including TTY and E911 requirements. As stated above, it was determined that the wireless and wireline functionality of its hybrid switch had to be separated into two distinct switches: a DMS-100 wireline switch

and a DMS-MTX wireless switch. Nortel originally told Cellular XL that the switch split would take place in January 2002. That date then slipped to June. In August, Nortel completed the switch split and should be able to complete the switch upgrade by November 16, 2002.

Testing and Deployment Activities

Once network TTY functionality is installed and Cellular XL has the handsets, Cellular XL will begin testing for compatibility and quality assurance within its own network. Presuming installation of the MTX10 software load takes place by the end of the fourth quarter, Cellular XL plans to test and deploy full TTY functionality throughout its entire 12-county service area by June 30, 2003.

Carrier Coordination of Testing with PSAP

Cellular XL has excellent relationships with the PSAP's in its service area and intends to utilize that relationship to assure complete communication functionality between handsets and PSAP's.

Carrier Testing Activities, Including Field Testing, Consumer End-To-End Testing, and other Necessary Tests

Cellular XL is a small carrier operating in two RSA's in South Mississippi. Once handsets have been acquired and network TTY functionality is installed, Cellular XL will begin testing. Testing will involve primarily three groups: Cellular XL engineers and technicians, PSAP representatives, and consumers. The University of Southern Mississippi has an active program assisting hearing-impaired people in this area and is one of many resources that will be utilized as a source of consumer test subjects.

Retail Availability of Necessary Consumer Equipment

Cellular XL intends to make consumer equipment available through all of its normal retail and direct sales outlets.

Geographic Scope of Network Infrastructure Deployment

Cellular XL operates its network in two relatively small RSA's in South Mississippi: MS 10 and MS 11. These two RSA's consist of 12 counties. Cellular XL will deploy the TTY solution over its entire network within this operating area.

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